

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

JUSTIN PULLIAM,

*Plaintiff,*

v.

Civil Action No. 4:22-cv-4210

COUNTY OF FORT BEND, TEXAS;  
SHERIFF ERIC FAGAN, in his  
individual capacity; OFFICER ROBERT  
HARTFIELD, in his individual capacity;  
OFFICER JONATHAN GARCIA, in his  
individual capacity; OFFICER TAYLOR  
ROLLINS, in his individual capacity;  
and OFFICER RICKY RODRIGUEZ, in  
his individual capacity,

*Defendants.*

**UNOPPOSED MOTION TO CONSOLIDATE BRIEFING AND MODIFY  
BRIEFING SCHEDULE**

Plaintiff respectfully requests that the Court modify the briefing schedule for pending and forthcoming motions to dismiss to allow the parties to consolidate their responses and replies. Plaintiff requests that the briefing schedule and page limits be modified as follows:

- Plaintiff shall file an omnibus response brief (responding to Dkts. 15, 19, 21, and any forthcoming motions to dismiss filed on behalf of a defendant by the Fort Bend County Attorney's Office) no later than February 14, 2023. It shall

be no more than forty (40) pages in length.

- All defendants represented by the Fort Bend County Attorney's Office shall file their corresponding omnibus reply brief no later than February 28, 2023.

It shall be no more than twenty-five (25) pages in length.

Dated: January 23, 2023

Respectfully submitted,

/s/ Victoria Clark

Victoria Clark, Attorney-in-Charge

Texas Bar No. 24109731

Federal ID No. 3749010

Jeffrey Rowes\*, of counsel

TX Bar No. 24104956

**INSTITUTE FOR JUSTICE**

816 Congress Ave., Suite 960

Austin, TX 78701

Tel: (512) 480-5936

Fax: (512) 480-5937

Email: [tclark@ij.org](mailto:tclark@ij.org)

[jrowes@ij.org](mailto:jrowes@ij.org)

*Attorneys for Plaintiff*

*\*Admitted pro hac vice*

### **CERTIFICATE OF CONFERENCE**

I hereby certify that on January 18, 2023, I conferred via email with counsel of record for defendants Fort Bend County, Fagan, Garcia and Rodriguez. Counsel indicated his consent to this motion. No other defendant currently has counsel of record.

/s/ Victoria Clark  
Victoria Clark, Attorney-in-Charge  
*Attorney for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 23, 2023, I electronically filed the foregoing motion with the Clerk of Court using the CM/ECF system and served by the CM/ECF system to all counsel of record.

/s/ Victoria Clark  
Victoria Clark, Attorney-in-Charge  
*Attorney for Plaintiff*